

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

APB ASSOCIATES, INC., a
Michigan corporation, individually
and as the representative of a class of
similarly-situated persons,

Case No. 2:09-cv-14959-SFC-RSW
Hon. Sean F. Cox

Plaintiff,

v

BRONCO'S SALOON, INC., BRONCO'S
ENTERTAINMENT, LTD., T & R
ENTERPRISES, INC., RIVER
ENTERTAINMENT LLC, and 31650
WEST EIGHT MILE, INC.,

Defendants.

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Harvey Kruse, P.C.
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DECLARATION OF ATTORNEY JASON R. MATHERS

I, JASON R. MATHERS, hereby declare the following:

1. I have personal knowledge of the facts and matters alleged herein and can competently testify to same.

2. I am an attorney at the law firm of Harvey Kruse, P.C., which represents Defendants BRONCO'S SALOON, INC., BRONCO'S ENTERTAINMENT, LTD., RIVER ENTERTAINMENT LLC, and 31650 WEST EIGHT MILE, INC., in the above-captioned matter.

3. On April 24, 2017, Harvey Kruse, P.C. served by U.S. mail a Notice of Class Settlement Pursuant to Class Action Fairness Act, 28 U.S.C. § 1715 upon the U.S. Attorney General and the Michigan Attorney General. Each notice attached a copy of the following documents:

- (a) The original Class Action Complaint, along with Plaintiff's Motion for Class Certification as originally filed therewith;
- (b) The Agreed Motion for Preliminary Approval of Class Action Settlement setting the final approval hearing;
- (c) The class notice, including the claim form;
- (d) The Settlement Agreement; and
- (e) A list containing the names of prospective class members.

4. The notice stated there are no contemporaneous agreements between class counsel and counsel for the Defendant in connection with the proposed settlement other than the enclosed Settlement Agreement.

/s/ Jason R. Mathers

Jason R. Mathers (P66022)

Harvey Kruse, P.C.

Attorney for Defendants

Dated: April 24, 2017

[X] Under penalties as provided by law pursuant to 28 U.S.C. § 1746(2), I certify that the statements set forth herein are true and correct

HARVEY KRUSE

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